

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

DAVID LEVINE and INDECO UNION  
Plaintiffs,

Civil Action No. 1:20-cv-1073 (TSE/TCB)

ANNE MEADOR  
Defendant.

**INDECO UNION BANKRUPTCY TRUSTEE'S STATUS REPORT**

Comes now the Chapter 7 Bankruptcy Trustee for Indeco Union, Janet Smith Holbrook (the "Indeco Trustee"), and for her response to the Court's Order entered June 22, 2021 requesting a status report states as follows:

1. As set forth in the Indeco Trustee's Status Report dated June 21, 2021, the Indeco Trustee filed an application to employ Steven S. Biss as special counsel to represent the bankruptcy estate in the instant action.
2. The Truth Tellers, LLC ("Truth Tellers"), an entity affiliated with Anne Meador, filed an objection in the Bankruptcy Proceeding (as defined in previous status reports).
3. The Bankruptcy Court scheduled a hearing on the application and objection on July 14, 2021.
4. Truth Tellers approached the Indeco Trustee prior to the hearing and requested a continuance in order for the parties to discuss a possible resolution to the objection. The Indeco Trustee agreed to this request.
5. At the hearing on July 14, 2021, the Indeco Trustee requested a 30 day continuance and the Bankruptcy Court agreed to this request.

6. The Bankruptcy Court has scheduled a continued hearing on the application and objection on August 18, 2021.

7. The Indeco Trustee requests that a decision on dismissal of this lawsuit be delayed until either this matter is resolved or Mr. Biss is employed as counsel to represent Indeco Union and the Indeco Trustee. If Mr. Biss is employed as special counsel in the Bankruptcy Proceeding, it is anticipated that dismissal of this case as to Indeco Union will be moot and that Mr. Biss will represent Indeco Union and Mr. Levine in this proceeding.

8. Alternatively, the Indeco Trustee requests that this action be dismissed without prejudice. Dismissal without prejudice will enable the Indeco Trustee the ability to file another defamation action should the Indeco Trustee determine that it is in the best interests of the Indeco Union bankruptcy estate to file such an action.

9. The Indeco Trustee strongly objects to dismissing the instant action with prejudice since this appears to be a significant asset of the Indeco Union bankruptcy estate and an application to employ special counsel is pending in the Bankruptcy Proceeding.

WHEREFORE, for the reasons set forth herein, the Indeco Trustee requests that this Court allow the Indeco Trustee additional time to employ special counsel for this action or to otherwise resolve the matter. Alternatively, the Indeco Trustee requests that this Court dismiss Indeco Union as a plaintiff in this action without prejudice. The Indeco Trustee requests such other and further relief as this Court deems appropriate.



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Janet Smith Holbrook, Bankruptcy Trustee  
for Indeco Union

Janet Smith Holbrook  
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Bankruptcy Trustee for Indeco Union

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Defendant.

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that she served the following with a copy of the foregoing *Indeco Union Bankruptcy Trustee's Status Report* by regular mail on July 15, 2021:

Steven S. Biss  
300 West Main Street, Suite 102  
Charlottesville, VA 22903

Heather Kathleen Bardot  
9990 Fairfax Blvd. Suite 400  
Fairfax, VA 22030



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Janet Smith Holbrook, Trustee